



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-01

Health Insurance Rate Filings - Filing Dates for Plan Year 2026

Issued: March 14, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Health carriers writing health insurance or health benefit plan coverage in Missouri

From: Angela Nelson, Director

Re: Health Insurance Rate Filing Key Dates (2026 Plan Year)

This Bulletin provides notice to health carriers of key filing dates for health benefit plans that will be offered during 2026, as required by §376.465, RSMo (2016)¹, and 20 CSR 400-13.100. These dates are based on current federal guidance and are subject to change.

As of the date of issuance of this bulletin, Congress has not taken action to extend beyond calendar year 2025 the expanded eligibility for Advanced Premium Tax Credits (eAPTCs) enacted as part of the American Rescue Plan. The Department's expectation for the 2026 plan year is that carriers will file ONE set of rates under the assumption that the eAPTCs will expire

¹ All statutory references herein are to RSMo (2016) unless otherwise noted.

ahead of plan year 2026. The Department will not accept a rate filing with multiple rates for multiple contingencies. However, included in the filing, and specifically within the actuarial memorandum, filing companies should document the assumptions that would change, the changes to those assumptions, and the impact to the rates that would result if the existing eAPTCs were to be extended for plan year 2026.

To ensure the Department has adequate time to review the rate filings and work with carriers, the submission deadline for the rate filing has been moved up a few weeks. As noted in the “Summary of Filing Timeframes for Plan Year 2026” below, this year’s submission deadline is June 4, 2025.

The Department will continue collecting information on the factors used in the pricing, including the actuarial value the companies calculate separate from the federal AV calculator, the induced demand factors, and the CSR load. For Plan Year 2026, the Department intends to continue its existing practice that these plan-level factors should not be based on ACA experience, either before or after the impact of risk adjustment². Instead, these factors, which constitute the AV and Cost Sharing Design of Plan (AVCDSP), item 3.3 in the Unified Rate Review Template (URRT) “may take into account the benefit differences and utilization differences due to differences in cost-sharing.”³ The allowance for risk adjustment, meanwhile, is intended to be market-wide, impacting only Worksheet 1 of the URRT. The plan-level factors should have a rational relationship to each other, as should the resulting AVCDSPs. (“Rational” takes into account the current environment of CSR loading.)

Carriers are also reminded of the provisions of 20 CSR 400-13.100, which codify the practice of applying the Cost Sharing Reduction (CSR) load only to Silver plans sold on the exchange and provide for more consistency in the approaches used to determine the induced demand factors (IDFs) and the CSR load.

Methodology to Determine Cost Sharing Reduction Adjustment and Induced Demand Factors

In order to have a consistent approach across carriers while allowing for some variation based on the particular set of products a carrier is offering, the Department offers the following guidance for plan year 2026 pricing.

Cost Sharing Reduction Adjustments

1. Consistent with 20 CSR 400-13.100, carriers should assume that at least 88% of the membership in a Silver plan will be in the two Platinum-level CSR variants of each plan (those with AVs of 87 and 94 percent). The assumed mix should be reasonable. For plan years 2027 and beyond, this percentage will be 95%.
2. Carriers should not use experience data for this plan-level adjustment. Instead, they

² Using the ACA experience naturally takes into account the morbidity of the population expected to enroll in the plan and/or differences due to health status, both of which have been specifically disallowed for several years in the federal guidance. See 45 CFR § 156.80, as well as <https://www.cms.gov/files/document/urr-py23-instructions.pdf>.

³ <https://www.cms.gov/files/document/urr-py23-instructions.pdf>

should use the benefit relativities between the base plans and their variants. For those relativities, carriers should use their own pricing AVs rather than the federal AV Metal Values.

3. There is no need to reflect any additional induced utilization - beyond what is discussed in the section below - in the CSR load calculation for Platinum-level Silver CSR variants.

Induced Demand Factors

For Individual plans, the induced demand factors are to be calculated using the following formula: $1.24 - AV + AV^2$, where AV refers to the AV Metal Values from the federal AV calculator. For base values of 0.6 for Bronze, 0.7 for Silver, 0.8 for Gold, and 0.9 for Platinum, the formula returns the IDFs used in the risk adjustment formula (1.00, 1.03, 1.08, and 1.15 respectively).

Summary of Filing Timeframes for Plan Year 2026

<u>Type of Plan</u>	<u>Filing Timeframe</u>
Single Risk Pool – Plans in Individual and Small Group ACA markets	File by June 4, 2025 to meet federal and state guidelines.
Transitional	File at least 60 days prior to use. Filings, which include finalized rates, that are submitted on or before August 13, 2025 will have their reviews prioritized. <u>Filings submitted later than August 13 may have reviews extend beyond the intended implementation date.</u>
Grandfathered	File at least 30 days prior to use.
Student Health Plans	File at least 60 days prior to use.
Other Health Benefit Plans (Dental, Vision, etc.)	File at least 30 days prior to use.

For additional detail regarding the timeframes in the chart above, please see the following sections.

Applicability

The rate filing timeframes apply to plan types subject to a determination of “reasonableness” pursuant to §376.465.7. For ease, this Bulletin will refer to the following plans as “Subsection 7 Plans”:

- “Health benefit plans” as defined in §376.465 (*excluding* plans sold in the large employer group market);
- Individual and small employer group plans subject to the requirements of the single risk pool;

- Student health plans; and
- Transitional plans.

Section 376.465 specifies the timeframes applicable to rate filings for all other health benefit plans including, but not limited to, grandfathered plans and excepted benefit plans.

File Rates for Individual and Small Group ACA Plans No Later than June 4, 2025

The Centers for Medicare and Medicaid Services (CMS), Center for Consumer Information and Insurance Oversight (CCIIO) designated Missouri as an “Effective Rate Review” state in 2017. To retain that status, the Department must ensure rate filings meet federal guidelines. This Bulletin serves to indicate that the Department intends to follow federal filing and posting guidelines to the extent possible under Missouri law.

For Plan Year 2026, proposed rates for Individual and Small Group ACA plans must be submitted to the Department no later than June 4, 2025.

Federal law exempts student health plans from the filing deadlines applicable to single risk pool plans. Likewise, federal guidance indicates that transitional plans have different deadlines than single risk pool plans. However, in order to comply with Missouri law, rates for student health plans and transitional plans should be filed with the Department at least 60 days prior to the proposed effective date.

Post Proposed Rates for Individual and Small Group ACA Plans – August 1, 2025

Current federal guidelines require “Effective Rate Review” states to publicly post proposed rates for single risk pool plans no later than August 1, 2025. The Department does not intend to publicly post proposed rates earlier than this date.

Optional Quarterly Rate Filings for the Small Group Market

Current federal law permits single risk pool plans in the small group market to adjust rates as often as quarterly. As Missouri law does not limit the frequency of rate filings, health carriers may submit quarterly rate filings for small group market plans.

- 2026 Plans: Health carriers should submit rate filings by June 4, 2025. Rate filings for subsequent quarters should be filed at least 60 days prior to the proposed effective date, as required by §376.465.

Transitional Plan Rate Filings

Missouri law does not differentiate between transitional plans and other Subsection 7 plans. Therefore, transitional plan rates must be filed at least 60 days prior to implementation, and are subject to the same standards of review as other Subsection 7 plans. However, while current federal guidance for transitional health plans only requires rate submissions where the proposed rate increase exceeds the federally identified rate review threshold, under Missouri law all transitional plan rate changes must be filed with the Department, regardless of the magnitude or

direction of the rate change.

Please note, for transitional plan rate changes that are less than the federal threshold, the Department will not require companies to also file concurrently with CMS per 20 CSR 400-13.100(8).

For Additional Rate Filing Guidance

General Instructions are available via the System for Electronic Rate and Form Filing (SERFF) for Missouri. Additional filing guidelines will be posted on the Department's website and updated as necessary.

Rate Filings for other Health Benefit Plans

For filing requirements applicable to grandfathered and excepted benefit plans that are not Subsection 7 plans, please see §376.465. For dental plans that a health carrier or licensed pre-paid dental plan intends to make available on the exchange, rates must be filed in accordance with §376.465, or thirty (30) days prior to the intended effective date.

Any questions or comments regarding this Bulletin should be directed to Camille Anderson-Weddle at 573-522-3311 or productfilings@insurance.mo.gov.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-02

Updated Catastrophe/Disaster Coordination Contact

Issued: March 28, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, and is not binding on the Department. See section 374.015, RSMo.

To: All insurers issuing policies covering real or personal property in Missouri

From: Angela L. Nelson, Director

Re: Updated Catastrophe/Disaster Coordination Contact

To ensure prompt and efficient communications with the insurance industry following a disaster, the Department requests insurers insuring real or personal property in Missouri to make sure the Catastrophe/Disaster Coordination Contact Information on file with the Department is current.

The Catastrophe/Disaster Coordination Contact should be available to communicate directly with the Director and senior Department leadership following a disaster within the state. This may include high-level communications about the Department's response efforts, the company's response efforts, logistic issues, and other urgent or non-urgent regulatory matters following a disaster.

This contact should also be able to discuss or make resources available to the Department to discuss media-related inquiries, coordinate joint communication and consumer outreach efforts, and participate in industry conference calls and meetings regarding disaster response matters.

If the Catastrophe/Disaster Coordination Contact has changed from what was previously provided, the Department requests that insurers submit updated contact information. Insurers do not need to file updated information at this time if the Catastrophe/Disaster Coordination Contact on file with the Department is current.

Insurers should submit updated Catastrophe/Disaster Coordination Contact information electronically using the Uniform Certificate of Authority Application (UCAA) process by completing a Change of Mailing Address/Contact Notification Form (Form 14). Please visit <https://content.naic.org/industry/ucaa> to make a Form 14 filing. There is no fee applicable to a Form 14 filing in Missouri. If you are unfamiliar with the UCAA electronic portal, please coordinate with your staff or consultants who typically handle corporate amendment filings for your insurer.

Any questions or comments regarding this Bulletin should be directed to the Market Regulation Division by telephone at (573) 751-7470 or by email at ProductFilings@insurance.mo.gov.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-03

Change in Producer Examinations

Issued: May 7, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Resident producers, prospective resident producers and insurers

From: Angela L. Nelson, Director

Re: Change in Producer Examinations

The Department issues this Bulletin to notify resident producers, prospective resident producers and insurance companies regarding an immediate change to the process for insurance producer examinations in the State of Missouri.

Effective immediately, those Missouri residents seeking to schedule an insurance examination may only take the test in a physical testing center. OnVue online proctoring, through PearsonVue, is no longer available for new reservations. Scheduled OnVue appointments will be honored through May 18, 2025; all other OnVue appointments scheduled on or after Monday, May 19, 2025, will need to be rescheduled for a physical testing center. The Department sincerely apologizes for the inconvenience to those who had planned to utilize the OnVue online proctoring.

Anyone who would like more information about insurance producer examinations or to find a physical testing center in the State of Missouri, please visit PearsonVue's Missouri website at:

<https://www.pearsonvue.com/us/en/mo/insurance.html>.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-04

Executive Order 25-24 – Prescription Medications

Issued: May 22, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Health carriers writing health insurance or health benefit plan coverage in Missouri

From: Angela L. Nelson, Director

Re: Executive Order 25-24 – Prescription Medications

On May 20, 2025, Governor Mike Kehoe signed [Executive Order 25-24](#), to ensure that individuals affected by the May 16, 2025 tornado and severe storms whose prescriptions were lost or destroyed, whose records are not available, or whose original prescribing physician is unavailable, will be able to continue to receive prescribed medications. Executive Order 25-24 authorizes the Department of Health and Senior Services and the State Board of Pharmacy to temporarily waive or suspend the operation of statutes or administrative rules to serve the interests of public health and safety during the period of emergency and the recovery period.

The Department is issuing this bulletin to assist individuals and entities regulated by the Department as they implement the Executive Order for insureds in areas affected by the May 16,

2025 storms. This bulletin applies to all health carriers, as that term is defined in section 376.1350, RSMo¹ and to any entities, including but not limited to pharmacy benefit managers and third-party administrators who administer prescription drug benefits on behalf of health carriers.

To ensure that residents impacted by the May 16, 2025 storms do not face additional financial hardships or delays in obtaining needed prescription drugs, the Director of the Department of Commerce and Insurance strongly encourages health carriers to allow enrollees to obtain refills of their prescriptions, even if the prescription was recently refilled. These consumers may not have access to their prescription medications because of storm damage. Health carriers should work with consumers to quickly provide coverage for replacement medications.

Health carriers who have questions or concerns should contact Amy Hoyt (amy.hoyt@insurance.mo.gov) or Gina Clark (gina.clark@dcf.mo.gov) at 573-751-4126. Consumers who have questions or concerns should contact the Department's Consumer Affairs Hotline at 800-726-7390 or complete a claim form online at <https://insurance.mo.gov/consumer-complaints/insurance-complaints>.

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¹ All statutory references herein are to RSMo 2016, unless otherwise noted.



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-05

St. Louis Tornado Response – Claim Holdbacks

Issued: June 12, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance (“Department”) to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All insurers adjusting claims for tornado-damaged structures in the City of St. Louis

From: Angela L. Nelson, Director

Re: Waiver of City of St. Louis Ordinance Pertaining to Insurance Claim Holdbacks

The Department issues this Bulletin to notify insurance companies of an immediate change to the process for claim holdbacks (withholds) for properties sustaining 50% or more damage from the May 16th St. Louis tornado. The City of St. Louis currently has an Ordinance in effect which requires such holdbacks, Ordinance [25.66.030](#).

Effective immediately, the City of St. Louis has decided to waive the mandatory holdbacks for structures that sustained 50% or more damage as a result of the May 16th tornado. For these properties, insurers should remit all payable amounts directly to the insured. Please see the attached Executive Order, with accompanying letter from Mayor Cara Spencer.

The waiver is specific to those properties that are located within the “Tornado Impact Area”. The “Tornado Impact Area” has been defined as the following neighborhoods which are located within zip codes 63105, 63112, 63108, 63113, 63115, 63107, and 63147:

Wydown Skinker, Skinker DeBaliviere, DeBaliviere Place, Central West End, West End Visitation Park, Academy, Fountain Park, Lewis Place, Vandeventer, Hamilton Heights, Wells Goodfellow, Kingsway West, Kingsway East, Greater Ville, The Ville, Jeff Vanderlou, Mark Twain, Penrose, O'Fallon, Fairground Park, Fairground, North Riverfront, O'Fallon Park and College Hill.

For further reference, insurers may also review the map that the City has available on this website: [interactive tornado area map](#)

To confirm, this waiver is specific to the City of St. Louis, and the holdback ordinance has not been waived for any other properties damaged or destroyed as a result of any other event on any other date. Accordingly, insurers should continue to withhold and submit funds to the City of St. Louis for claims on all other properties sustaining 50% or more damage that are the result of any other covered event.

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CARA SPENCER
MAYOR

OFFICE OF THE MAYOR
CITY OF ST. LOUIS
MISSOURI

CITY HALL - ROOM 200
1200 MARKET STREET
SAINT LOUIS, MISSOURI 63103-2877
(314) 622-3201

June 12, 2025

Director Angela Nelson
Missouri Department of Commerce and Insurance
301 West High St., Room 530
P.O. Box 690
Jefferson City, Mo 65102

Dear Director Nelson

The purpose of this letter is to request the Missouri Department of Commerce and Insurance's ("Department") assistance in sending a bulletin to all insurers operating in the State of Missouri advising them of a shift in the City's approach regarding enforcement of the "Holdback Law" for certain insured property owners impacted by the May 16, 2025, tornado.

Section 67.410, RSMo., creates what is known as the "Holdback Law." It provides that an insurance company shall withhold and pay to an implementing city twenty-five percent of the proceeds of an insurance policy on certain significantly damaged buildings or structures, and also authorizes the placement of a lien on that property in the form of a special tax bill. To use this law, cities are required to adopt it via ordinance. The City of St. Louis did so in 1996 through Ordinance 63838.

The law's purpose is to provide cities a meaningful way to address property that has become a public nuisance, by ensuring that the insured actually uses the claim money for the intended purposes and to prevent potential future losses. While it has historically proven a powerful tool for the City of St. Louis to hold problem property owners accountable, it has proven illogical for a situation where thousands of insured St. Louisans suddenly find themselves with significantly damaged property due to a tornado, in need of unexpected repairs, and competing with each other for contractors and supplies.

Consequently, the City is choosing to shift its "Holdback Law" enforcement approach specifically for insured property owners living in the tornado impact area whose property was damaged by the May 16, 2025, tornado. Today, I issued Executive Order No. 85, instructing the City Counselor and Building Commissioner to exercise their discretion under the law to waive their authority to pursue claims and/or



CARA SPENCER
MAYOR

OFFICE OF THE MAYOR
CITY OF ST. LOUIS
MISSOURI

CITY HALL - ROOM 200
1200 MARKET STREET
SAINT LOUIS, MISSOURI 63103-2877
(314) 622-3201

to issue certifications to release funds retained pursuant to the "Holdback Law" for a period of time up through and including December 31, 2026.

This instruction for the City Counselor and Building Commissioner to exercise their discretion under the law to waive their authority is narrowly-tailored for claims arising out of the May 16, 2025, tornado, and for the particular group of insured property owners living in the tornado impact area. In doing so, the City aims to prevent situations where insurance companies will effect the twenty-five percent withholding for any May 16, 2025, tornado damage insurance claim payouts for this specific group of individuals.

To assist the City in effecting and communicating this to insurance providers operating in the State of Missouri, the City asks your Department to please communicate this information to insurers operating in the State of Missouri via a bulletin. To support this bulletin, the City is providing 1) this letter, 2) a copy of the relevant Executive Order, and 3) a link to an interactive tornado impact area map.

The Department has been a tremendous source of information and support to the City and our tornado-impacted residents during this time of tremendous need. We know the Department shares our priority of providing common sense, compassionate relief to tornado-impacted property owners, and we greatly appreciate the Department assisting in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Cara Spencer", with a long, sweeping horizontal line extending to the right.

Cara Spencer
Mayor, City of St. Louis



**OFFICE OF THE MAYOR
CITY OF ST. LOUIS
MISSOURI**

**EXECUTIVE ORDER No. 85
MAYOR CARA SPENCER
June 12, 2025**

An Executive Order instructing the City Counselor and Building Commissioner to exercise their discretion to waive certain insurance claim payouts for property damaged by the May 16, 2025, tornado.

WHEREAS, Section 67.410, RSMo., sets forth what is known as the “Holdback Law,” which is intended to strengthen neighborhoods by ensuring that nuisance property owners make needed repairs to properties; and

WHEREAS, pursuant to state law, the City of St. Louis adopted Sections 25.66.030 through 25.66.050 of the City Code in 1996, requiring insurance companies paying out claims on certain properties which have been designated as a public nuisance or mandated by the City for demolition or repair to “holdback” into an escrow account at the City twenty-five (25) percent of the payout; and

WHEREAS, the law further authorizes the City to place a lien on such properties in the form of a special tax bill; and

WHEREAS, on May 16, 2025, the City experienced a storm system that produced a highly damaging mile-wide EF3 tornado, causing significant and widespread harm to its residents and their property, damaging at least 10,000 buildings, an estimated 88 percent of which are privately-owned; and

WHEREAS, on May 16, 2025, in response to the natural emergency created by the storms, the Mayor declared a state of emergency pursuant to City Revised Code Section 3.40.070, directing numerous City departments, including the Department of Public Safety, in which the Building Division is housed, to expedite proactive measures to provide storm response services to the City with the assistance of any and all City resources that may be necessary; and

WHEREAS, the intent of this law is to ensure that the insured actually uses the claim money for the intended purposes and to prevent potential future losses, and while it has historically proven a powerful tool for the City to hold problem property owners accountable, it has also proven illogical for a situation where tens of thousands of St. Louisans suddenly find themselves in need of unexpected repairs due to tornado damage and competing with each other for contractors and supplies; and



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CITY OF ST. LOUIS
MISSOURI**

WHEREAS, the City, Comptroller's Office, and Missouri Department of Commerce and Insurance are able and eager to partner together to provide common sense, compassionate relief to tornado-impacted property owners at risk of having this twenty-five (25) percent of their claim withheld pursuant to state law and City code; and

WHEREAS, the Mayor is able to effect this relief by instructing the City Counselor and Building Commissioner to exercise their discretion to waive their authority to pursue claims and/or to issue certifications to release funds retained pursuant to the "Holdback Law" in regards to claim payout intercepts or related property liens for properties located in the tornado impact area specifically damaged by the May 16, 2025, tornado, in order to support tornado-impacted property owners on their road to recovery; and

WHEREAS, the Mayor is also able to collaborate with the Comptroller's Office to effect this relief, by instructing the City Counselor and Building Commissioner to collaborate with and provide information to the Comptroller's Office as needed in order to allow the Comptroller's Office to release any already-intercepted insurance claim "holdbacks" pertaining to tornado-impacted properties in the tornado impact area; and

WHEREAS, the City understands that there are a small number of already-intercepted insurance claim "holdbacks" pertaining to May 16, 2025, tornado-impacted properties in the tornado impact area within the City Comptroller's accounts as a direct result of these "holdback" provisions; and

WHEREAS, the City is also able to partner with the Missouri Department of Commerce and Insurance to effect this, by providing the Department with information on this targeted and specific shift in enforcement to insurance companies operating within the State of Missouri, to allow the Department to send out a bulletin with this information to all such companies in an effort to prevent further claim "holdbacks" from occurring on tornado-impacted properties in the tornado impact area.

NOW, THEREFORE I, CARA SPENCER, MAYOR OF THE CITY OF ST. LOUIS, DO HEREBY DECLARE AND ORDER AS FOLLOWS, EFFECTIVE IMMEDIATELY:

SECTION ONE. Purpose.

- A. The purpose of the targeted, specific, and time-limited shift away from enforcing the provisions of Section 67.410, RSMo., as codified by the City under Ordinance No. 63838, as provided for through this Executive Order, is to prevent further claim "holdbacks" from occurring on those



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properties and in so doing reduce the threat to the public health, safety, and welfare of citizens, the decline of neighborhoods, and blight issues.

SECTION TWO. Instructing the City Counselor and Building Commissioner to Waive Their Authority to Pursue Claims on and Otherwise Effect the “Holdback Law.”

- A. I hereby instruct the City Counselor and Building Commissioner to exercise their discretion under the law to waive their authority to pursue claims and/or to issue certifications to release funds retained pursuant to the “Holdback Law” for a period of time up through and including December 31, 2026. This Order applies insurance claim “holdbacks” and related property lien provisions of Ordinance No. 63838, as codified in City code at Chapter 25.66, against properties and property owners that are located in the tornado impact area, as defined under Section Three of this Executive Order, for insurance claims arising solely due to damage caused by the May 16, 2025, tornado in the City of St. Louis.

SECTION THREE. Instructing the City Counselor and Building Commissioner to Collaborate as Needed with the Comptroller’s Office to Effect the Release of Certain Claims.

- A. I hereby instruct the City Counselor’s Office and the Building Commissioner to collaborate as needed with the Comptroller’s Office in order to effect the release of certain claims against which the “holdback” provisions of Ordinance No. 63838, codified in City code at Chapter 25.66, were effected.
- B. Such collaboration shall be limited to provide this benefit to properties and property owners that are located in the tornado impact area, as defined under Section Three of this Executive Order, for claims arising solely due to damage caused by the May 16, 2025, tornado in the City of St. Louis.

SECTION FOUR. Tornado Impact Area.

- A. For purposes of this Executive Order, the tornado impact area shall mean the following neighborhoods which are located in and along the path of the May 16, 2025, tornado, which are also located within zip codes designated 63105, 63112, 63108, 63113, 63115, 63107, and 63147:
- i. Wydown Skinker; Skinker DeBaliviere; DeBaliviere Place; Central West End; West End Visitation Park; Academy; Fountain Park; Lewis Place; Vandeventer; Hamilton Heights; Wells Goodfellow; Kingsway West; Kingsway East; Greater Ville; The Ville; Jeff Vanderlou; Mark Twain; Penrose; O’Fallon; Fairground Park; Fairground; North Riverfront; O’Fallon Park; and College Hill.



**OFFICE OF THE MAYOR
CITY OF ST. LOUIS
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SECTION FIVE. Information to be Provided to the Missouri Department of Commerce and Insurance.

- A. I hereby direct the Office of the Mayor to provide the following documentation to the Missouri Department of Commerce and Insurance ("Department") in order to effect the timely production and distribution of a bulletin sent by the Department to insurers operating in the State of Missouri, informing them of the City's targeted, specific, and time-limited shift away from the City Counselor's Office enforcing the provisions of Section 67.410, RSMo., as codified by the City under Ordinance No. 63838, against tornado-impacted properties in the tornado impact area:
- a. A copy of this Executive Order;
 - b. A letter from the Office of the Mayor describing the intent and parameters of this program;
 - c. Any other documentation as may be needed or requested by the Department to support the production and distribution of such a bulletin.

IN WITNESS WHEREOF, I have hereunto set my hand and caused to be affixed the Seal of the City of St. Louis this 12th day of June, 2025.

A handwritten signature in black ink, appearing to read "Cara Spencer", is written over a horizontal line. The signature is fluid and cursive.

MAYOR CARA SPENCER

ATTEST:

AMBER BOYKINS SIMMS, REGISTER



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-06

Data Call – 2025 Severe Weather

Issued: June 16, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance (“Department”) to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All insurance companies insuring personal (residential) property and/or comprehensive private passenger automobile insurance in Missouri

From: Angela L. Nelson, Director

Re: Data Call to Collect Information Relating to Severe Weather Events in 2025

The Department has received and continues to receive inquiries related to the insurance industry’s response to, and the impact of, severe weather that occurred across the State in 2025, and most recently, the tornado that struck St. Louis on May 16. This information is needed to assist federal, state, and local officials as they help affected residents recover from property damage resulting from these severe weather events.

With this Bulletin, the Department notifies all insurers that have written or issued personal (residential) property and/or comprehensive private passenger automobile insurance in the State of Missouri about the Director’s issuance of a limited data call. This data is being sought from all insurance companies that provided coverage under the mentioned insurance policy types in 2025.

Insurance companies market these policies under various names, but the purpose of this data call is to gather information on homeowners' policies, dwelling policies, personal fire and allied lines policies, renters' policies, condominium owners' policies, mobile homeowners' policies, and any other similar types of policies insuring personal property. The Department also intends to collect information on claims submitted or paid under the comprehensive coverage of a private passenger automobile insurance policy that were related to damage caused by the same weather events.

This data call is not seeking information relating to commercial property or any other non-property type of insurance coverage.

The data call requests information regarding claims resulting from severe weather events that occurred within the State in 2025, as well as information specific to the May 16 tornado that struck the City of St. Louis. The Department believes this data call is necessary to respond to inquiries, assist federal, state, and local officials, and allow the Department to assess the magnitude and impacts of this year's severe weather events on the industry.

The instructions and the data call template are attached for the readers' reference to this Bulletin as Addendum A and Addendum B. The data call will also be transmitted electronically to all designated company representatives. The first submission is requested by June 25, 2025.

Please note that any company-identifiable information submitted in response to this data call is a confidential closed record and shall not be subject to disclosure, pursuant to Section 374.071.2 RSMo.

The Department appreciates insurance companies' prompt attention and response to this data call. Further questions about the data call can be submitted to Statistics@insurance.mo.gov

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Missouri state data call regarding 2025 Tornado and State Catastrophe claims

Submission of reports

In order to access to the data collection software, all company contacts who plan to submit data on behalf of one or more companies will need to send an email to help@naic.org requesting that they be assigned the role highlighted below. In order to avoid unnecessary delays filing your first report, please send the email to NAIC help desk as soon as you know who will be submitting the data on your company's behalf.

The reports must be submitted using the template, [see Addendum B \(attached\)](#).

The template, "MO_2025_TORNADO", includes all coverage types and should be submitted to the data call in RDC labeled MO_2025_TORNADO. The role to request from the NAIC for this data call is **RDC_MO2025TORNADO_USER_PR**.

Once the permission is assigned, the report must be submitted by logging into the [NAIC reporting portal](#), selecting "PAC" as the "datacall group," and select the correct file name you are submitting. Before attempting to submit a file, please review the "File Submission Guide."

The first report is due by June 25, 2025, containing cumulative claims data as of June 16, 2025. Below is the reporting schedule:

Data Call Reporting Schedule:

Data Call Report Number	2025 Cumulative Claims Data Reported As Of	Report Due Date
1st Report	June 16, 2025	June 25, 2025
2nd Report	July 16, 2025	July 25, 2025
3rd Report	August 16, 2025	August 25, 2025
4th Report	September 16, 2025	September 25, 2025
5th Report	October 16, 2025	October 25, 2025
6th Report	November 16, 2025	November 25, 2025
7th Report	December 16, 2025	December 25, 2025



MO_2025_TORNADO

Data for two geographic regions are being collected in for this data call. Claims relating to the May 16th Tornado in the St. Louis region will be reported. The zip codes we are collecting for the St. Louis region include 63105, 63107, 63108, 63110, 63112, 63113, 63115, 63117, and 63147 and should be aggregated at the zip code level.

Using the same data call template, loss data for the entire state of Missouri will also be collected for any catastrophic losses in 2025. Catastrophic losses are any losses resulting from a severe convective storm and should be aggregated on the state level using a 00000 zip code.

INTRO TAB

In addition to detailed instructions regarding the scope of the data call, the intro tab has yellow highlighted data fields that must be completed. NAIC Group Code is a required field. Your file will fail without it. If you are not part of a group and therefore have no group code/name, please include your company code and name.

Reporting will be completed by each insurance company. Group's cannot submit an aggregate report.

RESIDENTIAL PROPERTY TAB

The intent of this tab is to collect cumulative losses on an aggregate level for all residential property coverages. The Residential Property Tab should not include renter/tenant or condominium unit owners policies.

PERSONAL AUTO TAB

The intent of this tab is to collect cumulative losses on an aggregate level for comprehensive private personal auto coverages.

RENTERS TAB

The intent of this tab is to collect cumulative losses on an aggregate level for all renters coverages. This tab should include Tenant and Condominium Unit Owners Insurance policies (HO4 or HO6).

All tabs are collecting the same data for the different lines of business:

Column A: Zip code of claim loss location. Note: When reporting aggregated statewide data, enter 00000 as the zip code

Column B: Number of Claims Received: number of all claims received by the company, regardless of whether payment was made or the closure status of the claim.

Column C: Number of Claims with Payment: number of all claims resulting in payment regardless of closure status of the claim.

Column D: Number of Claims without payment: number of all closed claims not resulting in payment.

Column E: Total Dollar Amount Losses Paid: total losses paid out.

Column F: Total Dollar Amount Case Incurred Losses: total paid plus reserves for outstanding claims.

TORNADO 2025 MISSOURI

Claims As Of Date:

6/16/2025

NAIC Group Code:

Group Name:

NAIC Group Code is a required field. Your file will fail without it. If you are not part of a group and therefore have no group code/name, please include your company code and name above.

NAIC Company Code:

Company Name:

INSTRUCTIONS

Please refer to the complete instructions, definitions and covered loss data to include in the schedules.

- All tabs included in this Excel Workbook must be reviewed, and all relevant information must be reported.
- Reporting will be completed by each insurance company. Groups cannot submit an aggregate report.

Data is authorized to be collected and is confidential pursuant to §§ 374.070, 374.071, 380.401, and 374.190, RSMo.

- This data call is intended to collect information from carriers regarding catastrophic storms affecting Missouri policyholders.
- Data is being collected for two geographic regions: the entire state of Missouri and the St. Louis region
- The St. Louis region is defined as the following zip codes: 63105, 63107, 63108, 63110, 63112, 63113, 63115, 63117, 63147 and will be reported at the individual zip code level.
- Data will be collected monthly and should include data beginning January 1, 2025, through the 16th of the reporting month. They should be reported by the 25th of the month.
- For example, by June 25, 2025, a company would provide claim information for the period of January 1, 2025 to June 16, 2025. By July 25, 2025, the company would provide claim information for the period of January 1, 2025 to July 16, 2025.
- For the aggregated state of Missouri, catastrophic losses are defined as losses resulting from a severe convective storm. For the purposes of this data call, DCI is defining a severe convective storm as a thunderstorm where one or more of the following are present:
 - Strong winds (wind equal to or greater than 58 mph (50 knots or ~93 km/h).
 - Large hailstones (hailstones of at least 1 inch in diameter).
 - A tornado (regardless of its strength).
- When reporting for the St. Louis ZIP codes, the May 16, 2025, tornado is the only catastrophic event for which data should be reported.
- Three tabs are provided for three lines of business: Residential Property includes Homeowners and Dwelling Fire (for non-commercial properties), Personal Auto includes only Comprehensive Private Passenger Auto, and Renters includes Tenant or Condominium Unit Owners Insurance policies (HO4 or HO6).
- When reporting for the state of Missouri, report all catastrophic losses for all severe convective storms that occurred in 2025, aggregated at the state level.
- Under the ZIP code data field, the ZIP code to use for the state of Missouri is 00000.
- The zip codes we are collecting for the St. Louis region include 63105, 63107, 63108, 63110, 63112, 63113, 63115, 63117, and 63147 and should be aggregated at the zip code level.
- Number of Claims Received: number of all claims received by the company, regardless of whether payment was made or the closure status of the claim.
- Number of Claims with Payment: number of all claims resulting in payment regardless of closure status of the claim.
- Number of Claims Closed without Payment: the number of all closed claims not resulting in payment.
- Total Dollar Amount Paid Loss: total losses paid out.
- Total Dollar Amount Case Incurred Loss: total paid plus reserves for outstanding claims.

CONFIDENTIALITY NOTICE

The State of Missouri authorizes the collection of information in the Missouri 2025 Tornado data call (the "Confidential information"), all of which shall be deemed to be confidential and exempt from public disclosure in accordance with state law. The State's contract with the NAIC requires the NAIC to protect and maintain the Confidential information. All Confidential information shall be protected and maintained in accordance with such contract and using reasonable security measures similar to those measures used by the NAIC for the protection of its own Confidential information of a similar kind.

Group/Company Contact

Name (FORMAT = First Last):

E-Mail Address (FORMAT = x@x.xxx):

Phone Number (FORMAT = xxx-xxx-xxxx):

Data Call Reporting Schedule:

Data Call Report Number	Cumulative Claims Data Reported As Of	Report Due Date
1st Report	June 16, 2025	June 25, 2025
2nd Report	July 16, 2025	July 25, 2025
3rd Report	August 16, 2025	August 25, 2025
4th Report	September 16, 2025	September 25, 2025
5th Report	October 16, 2025	October 25, 2025
6th Report	November 16, 2025	November 25, 2025
7th Report	December 16, 2025	December 25, 2025

NOTES:

Residential Property					
	Please Include Cumulative Claims and Losses as of date of reported date.				
Claim/loss location 5-Digit ZIP Code (00000 for the entire State of Missouri)	Number of Claims Received	Number of Claims With Payment	Number of Claims Closed without Payment	Total Dollar Amount Paid Loss (tip: paid loss should never be higher than case incurred loss)	Total Dollar Amount Case Incurred Loss (tip: case incurred should equal paid loss plus reserves for outstanding claims.)

Please Note: Data is authorized to be collected pursuant to §374.190, RSMo and §380.401, RSMo.

Please Note: Data is confidential pursuant to §374.070 and §374.071, RSMo.

Comprehensive Personal Auto					
	Please Include Cumulative Claims and Losses as of date of reported date.				
Claim/loss location 5-Digit ZIP Code (00000 for the entire State of Missouri)	Number of Claims Received	Number of Claims With Payment	Number of Claims Closed without Payment	Total Dollar Amount Paid Loss (tip: paid loss should never be higher than case incurred loss)	Total Dollar Amount Case Incurred Loss (tip: case incurred should equal paid loss plus reserves for outstanding claims.)

Please Note: Data is authorized to be collected pursuant to §374.190, RSMo and §380.401, RSMo.

Please Note: Data is confidential pursuant to §374.070 and §374.071, RSMo.

Renters					
	Please Include Cumulative Claims and Losses as of date of reported date.				
Claim/loss location 5-Digit ZIP Code (00000 for the entire State of Missouri)	Number of Claims Received	Number of Claims With Payment	Number of Claims Closed without Payment	Total Dollar Amount Paid Loss (tip: paid loss should never be higher than case incurred loss)	Total Dollar Amount Case Incurred Loss (tip: case incurred should equal paid loss plus reserves for outstanding claims.)

Please Note: Data is authorized to be collected pursuant to §374.190, RSMo and §380.401, RSMo.

Please Note: Data is confidential pursuant to §374.070 and §374.071, RSMo.



DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-08

Health Insurance – Revised Rate and Form Filings for Plan Year 2026

Issued: September 11, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance (“Department”) to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: Insurance companies writing health insurance or health benefit plan coverage in Missouri

From: Angela L. Nelson, Director

Re: Revisions to Rate and Form Filings for Plan Year 2026 in response to the United States District Court for the District of Maryland in *City of Columbus v. Kennedy*, No. 25-cv-2114-BAH (D. Md.) decision and expanded eligibility for Catastrophic Plans

BACKGROUND

The Department received notification from the Center for Consumer Information and Insurance Oversight at the Centers for Medicare and Medicaid Services (“CMS”) on the evening of Friday September 5, 2025, regarding CMS’s expectations for plan year 2026 rate and form filings in light of the United States District Court for the District of Maryland’s decision in *City of*

*Columbus v. Kennedy*¹. This bulletin describes actions, including changes to rate and form filings, that insurers and states must take in light of recent decisions and pending motions in the Federal District Court for the District of Maryland and the United States Court of Appeals for the Fourth Circuit. The Department acknowledges that recent guidance and court orders have created a fluid and uncertain regulatory environment for Plan Year 2026. We understand the challenges posed by these late-stage changes, but recognize their importance for consumer protection and market stability. We will continue to monitor developments and support insurers throughout this process to facilitate and accommodate their need to comply with federal requirements.

Pursuant to an order of the United States District Court for the District of Maryland in *City of Columbus v. Kennedy*, No. 25-cv-2114-BAH (D. Md.), the implementation of certain provisions of the recently promulgated Marketplace Integrity and Affordability Final Rule, 90 Fed. Reg. 27074 (June 25, 2025), has been stayed while the litigation remains pending.² These provisions were scheduled to go into effect on August 25, 2025.

As a result of the court's order, several provisions of the final rule did not go into effect, including but not limited to the changes to the de minimis ranges for actuarial value calculations (45 C.F.R. §§ 156.140(c), 156.200(b)(3), and 156.400). As noted in CMS's guidance, unless the court takes additional action prior to September 19, 2025, insurers must comply with the pre-rule standards, particularly the narrower actuarial value ranges. See the [September 5, 2025, Centers for Medicare & Medicaid Services \(CMS\) guidance](#) regarding updated timelines and necessary actions in response to the order of the United States District Court for the District of Maryland in *City of Columbus v. Kennedy* for information on the other affected provisions.

In the absence of any additional developments in the *City of Columbus v. Kennedy* litigation, insurers seeking certification of QHPs on the FFE may need to revise one or more of their plan designs for the 2026 Plan Year and submit updated rate and form filings for review. In particular, insurers that filed plans with actuarial values that used the expanded de minimis ranges under the Marketplace Integrity and Affordability Final Rule **must** submit revised rate and form filings and to reflect the allowable de minimis ranges under the court's order.

CMS also issued guidance on September 4, 2025, outlining additional hardship exemptions that will allow additional individuals to enroll in catastrophic plans.³ The Department strongly encourages insurance companies to review that guidance for additional information, and acknowledges that some insurers will need to make changes to their catastrophic plan rates as a result.

¹ <https://www.cms.gov/files/document/QHP-certification-updates.pdf>

² https://www.govinfo.gov/content/pkg/USCOURTS-mdd-1_25-cv-02114/pdf/USCOURTS-mdd-1_25-cv-02114-0.pdf

³ <https://www.cms.gov/files/document/guidance-hardship-exemptions.pdf>

RATE REVISIONS:

To expedite the Department's review, the Department offers the following guidance to those insurance companies needing to modify their 2026 rates as a result of the federal guidance on de minimis ranges:

1. Insurers should first submit a request to withdraw the previous rate filing by sending a Note to Reviewer in the System for Electronic Rates and Forms Filing (SERFF); then
2. The insurer should submit a new filing with updated rates via SERFF; and
3. These new rate filings must be received by September 24, 2025

Please note that the only changes that can be accommodated under this expedited review process are for the required revisions of plan actuarial values, necessary plan design changes that insurers must make to comply with the court's order, changes to the existing catastrophic plan rates due to the revised guidance, and any immediate downstream impacts resulting from those changes.

In addition to the most recent version of all of the required documents submitted with the original rate filings for Plan Year 2026, revised rate filings must also include the following materials in the Supporting Documentation tab of the revised rate filing in SERFF, unless otherwise noted:

- A redline version of the actuarial memorandum reflecting any updates;
- A cover letter that includes the SERFF Tracking Number of the original rate filing and a concise overview of the actuarial memorandum changes and the rationale for such changes as they relate to the above-listed provisions;
- An attestation that the only changes being made are for the required revisions of plan actuarial values, necessary plan design changes that insurers must make to comply with the court's order, changes to the existing catastrophic plan rates due to the revised guidance, and any immediate downstream impacts resulting from those changes.
- A copy of the Rate Table Template in an Excel format, filed in the Rate/Rule Schedule tab; and
- A screenshot of the results of the Actuarial Value Calculator

If an insurer decides not to offer a plan impacted by the change in the allowable de minimis range in Plan Year 2026, the insurer should include that information in the supporting documentation tab, and the revised filing should reflect any additional impacts of the decision not to offer a plan in 2026.

FORM REVISIONS:

Insurers must ensure that all forms and templates comply with the court order and remain in compliance with the Public Health Service Act (PHS Act) provisions added by the CAA, 2021. See the [September 5, 2025, Centers for Medicare & Medicaid Services \(CMS\) guidance](#) regarding updated timelines and necessary actions that must be taken in response to the order of the United States District Court for the District of Maryland in *City of Columbus v. Kennedy*.

For forms needing revisions, pursuant to § 376.1186, RSMo, the Department defers to CMS to complete the Change Analysis Report or State Authorization Form. As such, insurers should continue to submit their state authorization forms to CMS Form Filings. This instruction differs from the September 5, 2025, CMS guidance; however, the Department has confirmed with CMS that Change Analysis Reports and State Authorization Forms for insurers in Missouri should continue to go to CMS Form Filings, rather than to the Department.

The action needed to update forms filed with the Department varies depending on whether the filing has been closed or is currently open. The following steps should be completed by September 16, 2025.

If the form filing has been closed:

- Email productfilings@insurance.mo.gov to request that a specific filing be reopened. Please include the SERFF tracking number, contact information, including name, telephone number, and extension number, if necessary, as well as the email address for priority filing inquiries from the Department.
- When you are notified that the filing has been reopened, promptly attach the revised forms under the Form Schedule tab. Please include redline versions under the Supporting Documentation tab, along with all other documents that require changes, including but not limited to the Statement of Variability and an attestation that no other changes have been made, except those required revisions necessary to comply with the court's order.

If the form filing is currently open:

- Send a Note to Reviewer from within your SERFF form filing to let the reviewer know you will be revising the forms submitted in this filing. Please include contact information, including name, telephone number, and extension number, if necessary, as well as the email address for priority filing inquiries from the Department.
- Replace the necessary forms under the Form Schedule tab, attach redline versions under the Supporting Documentation tab and all other documents that require changes, including but not limited to the Statement of Variability and an attestation that no other changes have been made, except those required revisions necessary to comply with the court's order.

If the Department requires any additional information or clarification regarding the changes, you will be contacted through SERFF or by phone.

Any questions or comments regarding this Bulletin should be directed to Camille Anderson-Weddle at 573-522-3311 or productfilings@insurance.mo.gov.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-09

Missouri's Uninsured Motorist Program

Issued: September 11, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All insurance companies licensed to write automobile liability insurance coverage in Missouri

From: Angela Nelson, Director

Re: Implementation of Missouri's Uninsured Motorist Program

The Missouri Department of Commerce & Insurance (DCI) has received information from the Missouri Department of Revenue (DOR) about implementing Senate Bill 398, which was enacted on July 6, 2023.

Following the passing of SB398, DOR must establish an online platform to verify that vehicle owners comply with state financial responsibility laws. The program will include real-time insurance verification, ongoing compliance monitoring, and a pre-trial diversion program. As a result, DOR is announcing the development of the Missouri Insurance Verification System (MOIVS), the state's new uninsured motorist verification program. DOR will be transitioning to MOIVS over the next several months.

As part of this process, all licensed insurance companies writing automobile liability insurance coverage in Missouri are required to register with MOIVS by October 15, 2025. The MOIVS website is used for user registration, account management, reporting, user management, and providing help to insurance companies. To register, go to www.MOIVS.com (**Website not available until September 15, 2025**), click on the “Register” link in the top menu and fill out the required information. The MOIVS help desk will contact insurance companies after the registration is approved to begin the testing process.

An Insurer Reporting Guide has been made available on the MOIVS website to assist insurance companies in preparing for reporting requirements and ensuring compliance with system standards. All insurance companies are strongly encouraged to review this guide thoroughly.

Key dates for insurance companies are listed below:

September 15, 2025	MOIVS is available to insurance companies for registration, testing, and production integration.
October 15, 2025	Deadline for insurance companies to register on the MOIVS website.
January 15, 2026	Deadline for insurance companies to begin testing. Insurance companies must submit a test BOB file to MOIVS and begin web services testing.
March 16, 2026	Deadline for insurance companies to move to production with MOIVS, making their production web services available (if applicable) and begin BOB data submissions.

Insurance companies must continue reporting coverage information to DOR using their existing reporting processes until MOIVS is fully operational.

DOR will provide additional updates as the program is implemented and timelines for transition are finalized. Any questions or comments regarding this Bulletin should be directed to DOR’s MOIVS help desk at support@MOIVS.com.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-10

Post Storm Cancellations and Non-Renewals

Issued: October 13, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All property and casualty insurers writing homeowners and dwelling insurance covering residential properties

From: Angela L. Nelson, Director

Re: Policy Non-Renewals and Cancellations

Missouri has experienced a number of devastating severe storms and tornadoes this year. These natural disasters have left many Missourians in the difficult position of recovering from property damage. The widespread nature and volume of storms has unfortunately complicated recovery efforts.

Recently, the Department was made aware of certain practices by some insurers that are not appropriate following the wide-scale disaster events of this year.

As one can expect after natural disasters, repairs can be delayed for a number of reasons the policyholder does not control, including but not limited to, shortages of contractors or building supplies.

Policyholders impacted by a disaster should always be given a reasonable amount of time to complete repairs necessary, to make the insured premises habitable and to return the property to its pre-loss condition before insurers take adverse underwriting actions such as cancellations or non-renewals.

Simply put, policyholders should have sufficient time to complete necessary repairs without having to worry about finding replacement insurance coverage.

Effective immediately, insurers in this State shall not issue a cancellation or non-renewal of a policy covering a residential property that was damaged by a storm until otherwise notified by the Department or this Bulletin is rescinded. This directive applies to a residential property located anywhere within the State of Missouri for any storm or weather losses occurring after March 1, 2025, and is specific to those underwriting actions taken on the basis of claims activity and/or the condition of the property.

To the extent such actions have been processed and/or notices mailed, insurers are directed to take all necessary actions to ensure coverage remains in force and to notify impacted policyholders.

This moratorium does not apply to properties not damaged by this years' storms; it does not apply to cancellations due to non-payment of premium and should not be interpreted as a permanent moratorium. At the same time, the Department encourages impacted insureds to repair their property as expeditiously as possible.

If, for reasons such as administrative efficiency, an insurer extends the application of this policy on a wider basis, the Director would be supportive of such measures and hereby extends a regulatory safe harbor to those insurers.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-11

Addendum: Post Storm Cancellations and Non-Renewals

Issued: November 4, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All property and casualty insurers writing homeowners and dwelling insurance covering residential properties and property and casualty insurers writing Condominium Master Policies

From: Angela L. Nelson, Director

Re: Addendum: Post Storm Policy Non-Renewals and Cancellations for homeowners and dwelling policies covering residential properties and master policies issued to condominium owners/associations

Since the issuance of [Bulletin 25-10](#) the Department has received inquiries from Missouri consumers, producers and insurers. This Bulletin is being issued as both an addendum and a clarification to [Bulletin 25-10](#), issued on October 13, 2025.

The Department has received multiple complaints indicating that condominium complexes throughout the State of Missouri have received non-renewal or cancellation notices. These are for master policies issued to the condominium owner/association and not policies issued to individual condominium unit owners. The Department understands these condominiums are still in the process of negotiating their damage claims with their insurance companies or are in the process of completing repairs. The Department was advised that these non-renewals are adversely affecting hundreds of condominium residents throughout the state, causing significant coverage issues.

As a result of these inquiries and complaints, the provisions of [Bulletin 25-10](#) are hereby extended to apply to master policies issued to condominiums located within the State of Missouri, effective immediately. This extension does not, in any way, apply to Condominium Homeowners policies (commonly referred to as an HO-6 or its equivalent).

The Department also received inquiries asking if [Bulletin 25-10](#) was intended to apply to commercial property policies and from insurers seeking guidance on the anticipated duration of [Bulletin 25-10](#). The Department was also asked to provide further guidance in terms of the applicability of the moratorium as to non-renewals and cancellations that were effectuated prior to the issuance of [Bulletin 25-10](#).

The following information is intended to address those questions and provide additional information and guidance to impacted insurers.

- [Bulletin 25-10](#) clearly limited the scope of the Bulletin to insurers writing and issuing homeowners and dwelling policies covering “residential properties”. Accordingly Bulletin 25-10 was not intended to apply to commercial properties.

However, with the issuance of Bulletin 25-11, that scope is now modified to also include master policies issued to condominium owners/associations, as further detailed in this Bulletin. No other insurance policies covering other properties or risks are included within the scope at this time.

- The Department continues to closely monitor consumer complaints, updates from State Emergency Management officials and media reports from around the State to determine the status of recovery efforts. The Department continues to receive volumes of consumer complaints and inquiries as well as media inquiries relating to recovery delays. Most delays have been related to contractor or supply issues, but some are related to debris (in St. Louis), which has complicated recovery efforts. A number of complaints and media reports have unfortunately focused on concerns

about claims handling by insurance companies, which have allegedly resulted in delays.

As to the expected duration of the Bulletin, the Department directs readers to [Executive Order 31](#), issued by Governor Mike Kehoe on October 29, 2025. This Executive Order extends the State of Emergency within the State, due to “ongoing conditions of distress and hazard to the safety, welfare and property of the Citizens of Missouri.”

The Department will continue to monitor recovery efforts, but in terms of guidance, the Department anticipates Bulletin 25-10 and Bulletin 25-11 will remain in effect for at least as long as a State of Emergency exists within the State. Executive Order 31 is currently set to expire on December 31, 2025, *unless otherwise extended*.

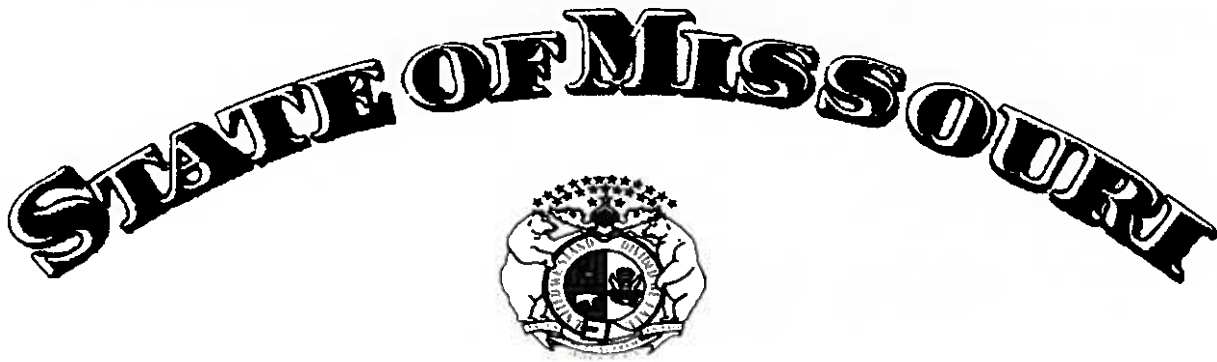
- The Department has also received questions about how far back insurers are expected to reinstate coverage. The Department reminds insurers of the intent behind both Bulletins, which is to ensure that property owners who have been unable to complete repairs (for any multitude of reasons) have insurance coverage and that they are not forced to secure coverage for a home that still has unrepaired damage.

For those circumstances where coverage has not yet expired or terminated, the Department expects insurers to take necessary actions to ensure coverage remains continuously in force.

For those circumstances where coverage ended prior to the issuance of either Bulletin, the Department expects insurers to consider the individual facts and circumstances and use their best judgment in extending or otherwise reinstating coverage. Insurers will be asked to provide an explanation for why coverage was not extended or reinstated for a policyholder in those cases where a consumer complaint is filed with the Consumer Affairs Division.

Any further questions from insurers regarding this Bulletin should be directed to the Market Regulation Division by email at marketconduct@insurance.mo.gov.

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DEPARTMENT OF COMMERCE & INSURANCE

P.O. Box 690, Jefferson City, Mo. 65102-0690

INSURANCE BULLETIN 25-12

Senate Bill 3 (2025) – Tax Credits

Issued: December 1, 2025

The following Bulletin is issued by the Missouri Department of Commerce and Insurance ("Department") to inform and educate the reader on the specified issue. It does not have the force and effect of law, is not an evaluation of any specific facts or circumstances, shall not be considered a statement of general applicability and is not binding on the Department. See § 374.015, RSMo (2016).

To: All Licensed Property and Casualty Insurance Companies Issuing Homeowners, Dwelling and Renters Insurance Policies in Missouri

From: Angela Nelson, Director 

Subject: Tax Credits for Insurance Deductibles on Insurance Claims Occurring in 2025 (Senate Bill 3 – 2025)

The Department requests that insurers (writing homeowners, dwelling, or renters policies) provide claim-related information to their policyholders for claims that occurred in calendar year 2025. A very limited amount of information is needed, and that information is detailed below in this Bulletin. The request is to provide this information directly to the policyholder - **only when requested by the policyholder**. The insurer may deliver the information to its policyholder via mail, email, or other secure electronic methods. This information will help eligible policyholders redeem a tax credit to offset any claim deductible(s) they incurred in 2025.

Background

[Senate Bill 3](#) was enacted in the First Extraordinary Session of 2025, containing provisions relating to a “Tax Credit for Homestead Damage”. [Section 135.445 RSMo.](#) of Senate Bill 3 allows a Missouri taxpayer to redeem a tax credit **if** the taxpayer suffered a loss to their property and had an insurance claim that was the direct result of a disaster for which a request for a Presidential Disaster Declaration was made by Missouri Governor Mike Kehoe, with a date of loss occurring between January 1st and December 31st 2025.

The amount of the tax credit is the amount of the deductible the taxpayer (policyholder) incurred, up to \$5,000. While the tax credit is only available for those losses occurring in calendar year 2025, the tax credits are allowed to be “carried forward” for up to 29 tax years (until 2055), until the full amount of the tax credit is redeemed.

To claim the tax credit, taxpayers (policyholders) impacted by this year's weather events are required to submit certain information about their insurance claim to the Missouri Department of Revenue as a part of their tax return, as provided under Section 135.445 RSMo.

The Request

The Department recognizes that, for most claims, initial claim communications and settlement breakdowns have already been provided to policyholders. Having said that, the Department also recognizes that, due to the timing of this law’s passage, policyholders may not have retained such documentation or that it may have become misplaced since the time of their claim.

Accordingly, the Department is requesting that insurers, upon request of their policyholder(s), simply provide documentation of a few pieces of information regarding the claim so eligible policyholders can take advantage of this tax credit.

Insurers are only being asked to provide basic information about the claim, as specified below, for any homeowners, dwelling or renters insurance claim that occurred in calendar year 2025. This information will be submitted by the policyholder with their tax return to the Missouri Department of Revenue for verification of eligibility for the tax credit:

Claim Information Needed:

- **Name of the Insurance Company:** Full legal name of the insurance company issuing coverage.
- **NAIC Number:** Please provide both the Group Code and Company Code assigned by the National Association of Insurance Commissioners (NAIC).

- **Policyholder's Name(s):** Full legal name(s) of the named insured(s) on the policy.
- **Policy Number:** The unique identifier assigned to the insurance policy.
- **Address of Insured Property ("the Homestead"):** Full street address of the property that sustained damage, including city, ZIP code, and county (if available).
- **Date of Loss:** The calendar date on which the damage or loss occurred.
- **Deductible Amount:** The dollar amount of any deductible(s) that were imposed or applied to the claim as required under the policy.

Insurers are asked to keep in mind that the intent of this request is only to assist Missouri residents in claiming this tax credit. The Missouri Department of Revenue needs this information to verify eligibility and the amount of the tax credit. Insurers are also advised that individual tax return information is confidential pursuant to Section 32.057 RSMo.

Insurers are not obligated to verify if the claim qualifies for the tax credit. For simplicity and ease of administration, insurers may simply provide this information upon request for any homeowners, dwelling, or renters claim that occurred between January 1, 2025, and December 31, 2025.

If a claims settlement breakdown containing all the information above was previously provided to the policyholder through the normal claims process, insurers are simply asked to provide a duplicate copy, if requested by the policyholder, to assist in the submission of their 2025 tax return. In such circumstances, there is no need to create new documentation.

The information outlined above should be provided in writing but can be delivered to policyholders via mail, email or other electronic means, consistent with applicable Missouri laws and policyholder preferences. Preferably, this information can be provided in a format that clearly identifies it as having been generated by the insurance company (e.g., on company letterhead).

Insurers are encouraged to use their best judgment and efforts to provide the information as requested herein.

Questions regarding this Bulletin may be directed to the Missouri Department of Commerce and Insurance at marketconduct@insurance.mo.gov.

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